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**Compliance Inspection Report  
COS Samoa Packing Inc. NPDES Permit No. AS 0000027**

**November 6, 2006: Compliance Inspection of Facilities, Wastewater Effluent, Flow Measurement, Laboratory, and DMRs**

The ASEPA representative Kris McPhee arrived at COS Samoa in the village of Atuu at 1pm on November 6, 2006. COS Samoa was represented by Craig Double and Ken McCloud.

Initially, wastewater collection and treatment facilities were observed to assess their condition and effectiveness.

**Influent Drainage and Sumps**

The influent drainage grates and sumps run throughout the plant collecting the wastewater. Most of the wastewater is collected within the plant. Some wastewater was collected along some uncovered alleyways. There was a heavy down pour of rain during the inspection and a fair amount of rainwater spilling off the roof entered the wastewater collection system. Wastewater is transported through many pipes and pumps leading to the treatment facilities. Some pumps were noticeably in need of repair.

**Headworks Solids Removal**

The wastewater passes through the mechanical bar screens to remove the large particles. The large particles of waste drop into bins. This solid waste is ocean dumped, which is allowed by the USEPA ocean dumping permit.

**Dissolved Air Floatation (DAF)**

The wastewater is treated by the DAF. The DAF causes most of the suspended solids to float to the surface of the tank where it is skimmed off into the solids drop area and into the high strength sludge tank. The air pressure tank pressure gauges were difficult to read.

Photo 1: DAF



### **High Strength Sludge Tank**

The solids from the DAF drop through the grate and enter the high strength sludge tank. This sludge is ocean dumped that is allowed by the USEPA ocean dumping permit.

### **Flow Measuring Device**

The DAF wastewater effluent then flows to the flow measuring device or 9 inch Parshall Flume. The Parshall Flume is equipped with an automatic height measuring device operating on a float. The meter box above the flume appeared in disrepair and was difficult to read. The flume has a water height measurement gradations attached inside, which is used to occasionally check the metered flow calculation.

### **Wastewater Effluent to Outfall Pipe**

The effluent color was a copper brown. Odor was a strong fish smell throughout the collection and treatment process, especially near some collection sumps and over the DAF. No floating material was noticed in the effluent. The effluent finally flows through the outfall pipe under the dock to a 16 inch outfall pipe. The outfall pipe runs 8,700 feet along the bottom of the harbor to the discharge area outside the Onesosopo village reef, and adjacent to the permanently stationed green buoy in the harbor.

### **Laboratory**

The COS laboratory samples and tests for all parameters except for metals. The samples to test for metals are sent off island to qualified laboratory. There was a shortage of sampling jars, and

operators were using any type of jars they could acquire on their own, although new sampling jars were on order.

These laboratories have successfully completed previous annual USEPA QA/QC testing, thus confirming proper laboratory sampling and testing procedures. The current USEPA QA/QC sample testing is now being required twice a year.

### **Discharge Monitoring Reports (DMRs)**

The DMRs have been submitted on time and have met permit requirements.

### **Deficiencies or General Findings and Recommendations**

The following are a list of deficiencies or general findings found and their corresponding recommendations.

Deficiency with Recommendation #1: Foul odor was strong throughout the wastewater collection and treatment process. Recommend COS Samoa develop a plan to decrease the foul odor.

Deficiency with Recommendation #2: There was a shortage of sampling jars. Recommend COS Samoa keep an ample supply of sampling jars in stock.

General Finding with Recommendation #1: The air pressure tank pressure gauges and flow meter was difficult to read. Recommend to repair the pressure gauges and flow meter box to allow for easier recording.

COS Samoa is required to respond in writing within 30 days of receiving this report, to the deficiencies, general finding and recommendations stated above. COS Samoa shall submit their response to USEPA Region 9 and ASEPA.

cc: Carl Goldstein, USEPA  
Peter Peshut, ASEPA  
Craig Double, COS Samoa